

# **EXHIBIT B**

## Brocker, Peter (Law)

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**From:** Brocker, Peter (Law)  
**Sent:** Friday, August 23, 2019 2:53 PM  
**To:** 'Elena Cohen'  
**Cc:** 'Gideon Oliver'  
**Subject:** Edrei, et al., 16 Civ. 1652 - Plaintiff's Document Requests and Interrogatories

Good Afternoon Elena:

Defendants consent to a third extension of plaintiffs' deadline to serve discovery requests, with the understanding that the defendants are under no obligation to respond to the document requests and interrogatories dated August 19, 2019, and that the parties will work in good faith to limit the scope of plaintiffs' interrogatories and document requests, including to better reflect the issues actually raised in this matter as required by Local Rule 26.5 of the Southern District of New York. (*e.g.*, Demand to Inspect No. 77 ("Plaintiffs seek to inspect one of each other type of LRAD that the NYPD..." without limitation to the model actually used in this incident); Document Request No. 68 (seeking, *inter alia*, seeks information related to "'distraction devices' such as stun, flash-bang, or concussion grenades," "pepper spray," "TASERS and other energy weapons," "Explosive devices," and "Deadly physical force" none of which are related to the case at bar); Interrogatory Nos. 2-5 (seeking information related to arrests of non-parties unrelated to the claims and defenses in this matter)). In light of the foregoing, defendants consent to a revised deadline of September 6th for plaintiffs' to serve document request and interrogatories.

Additionally, as previously discussed, I also write to memorialize defendants' consent to plaintiff's responses to defendants' document requests and interrogatories being due September 16th.

Best,

Peter

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